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Before the  
Federal Communications Commission  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

ORIGINAL

In the Matter of )  
)  
)

Reallocation of Television )  
Channels 60-69, the )  
746-806 MHz Band )

ET Docket No. 97-157

TO: The Commission

REPLY COMMENTS OF TRIBUNE BROADCASTING

Tribune Broadcasting Company ("Tribune") hereby files its Reply Comments in the above-referenced proceeding. Tribune recognizes the large and often conflicting demands for spectrum currently pending before the Commission and applauds its efforts to accommodate these demands.

Tribune specifically opposes the chorus of land mobile and public safety users who urge the Commission to eliminate all broadcast television users in Channels 60-69.<sup>1</sup> As repeatedly demonstrated by MSTV and the Broadcasters Caucus in the ongoing Advanced Television Proceeding, there simply are too many broadcast stations in the country to eliminate completely the use of these channels during the transition to DTV.

<sup>1</sup> See, e.g., Comments of National League of Cities, et. al. at 1, Comments of The Association of Public-Safety Communications Officials International, Inc. ("APCO") at 3; Comments of City of Tucson at 1.

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Instead, Tribune submits that its initial comments represent a reasonable compromise. Specifically, the Commission should eliminate any NTSC/VHF to DTV/UHF assignments on Channels 60-69 in the DTV Table of Allotments before reallocating any of these channels for public safety or land mobile use.<sup>2</sup> These changes are necessary because the DTV power levels necessary to replicate the service areas of these NTSC/VHF stations would create unacceptable interference to the proposed, relatively low power public safety or land mobile operations on both upper and lower adjacent channels -- interference that would not be eliminated by the FCC's RF emissions mask. See Tribune Comments & Accompanying Statement of Charles Rhodes. Several commentors recognized adjacent-channel interference problems to land mobile and public safety users presented by high-powered DTV allocations on Channels 60-69. See, e.g., Comments on National Public Safety Telecommunications Council at 6-7; Comments of the State of California at 13-14.

However, as made clear in Tribune's opening comments, the Commission should not, and indeed cannot, eliminate NTSC/UHF to DTV/UHF assignments in the 60-69 range. First, the DTV power levels necessary to replicate a NTSC/UHF station's service area do not present the same interference issues. Id. Second,

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<sup>2</sup> See In the Matter of Advanced Television Systems and Their Impact Upon Existing Television Broadcast Service, Sixth Report & Order, MM Docket No. 87-268, FCC 97-115 (released April 21, 1997).

especially in the most congested regions of the country, the Commission cannot double the number of existing television stations and retain the same high level of free, over-the-air service without using at least some of those channels during the transition to DTV.

Tribune's initial comments also specifically demonstrated that the sideband splatter caused by KTLA(TV)'s operations on DTV Channel 68 in Los Angeles would cause unacceptable levels of interference to both upper and lower adjacent-channel public safety and land mobile operations.<sup>3</sup> Comments of Tribune Broadcasting at 2-3 & Accompanying Statement of Charles Rhodes. To alleviate this problem in the heavily congested Los Angeles market, Tribune submits that the Commission should change KTLA's DTV assignment to Channel 31. In support of this proposal, Tribune submits the attached engineering statement of du Treil, Lundin & Rackley which demonstrates that the proposed change satisfies the Commission's requirements for proposed changes to the current DTV table. Specifically, although the proposed DTV 31 allocation does not satisfy the Commission's co-channel spacing requirements for DTV-NTSC allocations in Zone 2, the mountainous terrain in the area prevents the creation of new co-channel interference.<sup>4</sup>

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<sup>3</sup> The licensee of KTLA is wholly-owned by Tribune.

<sup>4</sup> The consideration of the mountainous terrain in Southern California to support the greater re-use of channels below 60 was  
(continued...)

See Statement of du Treil, Lundin & Rackley. In addition, no significant incremental amounts of adjacent-channel interference will be created by the proposed change in KTLA's DTV assignment. Id.

Moreover, Tribune's requested change for KTLA is consistent with the Commission's objective in this proceeding. As the County of Los Angeles notes, the need for additional spectrum for public safety users is nowhere more urgent than Los Angeles: "the Los Angeles metropolitan area is one of the most, if not the most, heavily spectrum congested regions of the county. Public safety agencies in the area are desperate for substantial new spectrum to assist in their ever-increasing job of protecting life and property."<sup>5</sup>

Given the demonstrated need for additional land mobile and public safety frequencies in Los Angeles, Tribune submits that the proposed DTV channel change for KTLA from 68 to 31 is decidedly in the public interest. In addition, Tribune urges the Commission to revise its DTV table to eliminate any other NTSC/VHF to DTV/UHF assignments in the 60-69 range. Without such action, public safety and land mobile users will effectively be prevented from using even adjacent channels in the service areas

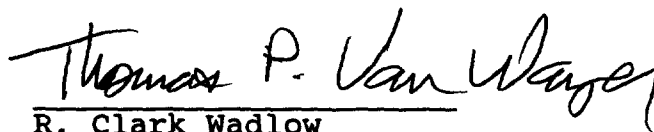
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<sup>4</sup> (...continued)  
specifically endorsed by the County of Los Angeles in this proceeding. See Comments of City of Los Angeles at 3.

<sup>5</sup> Comments of City of Los Angeles at 2.

of these stations. However, Tribune urges the Commission to use Channels 60-69 for NTSC/UHF to DTV/UHF assignments where necessary to ensure that the American public continues to receive the highest quality, interference-free over-the-air television service.

Respectfully submitted,

A handwritten signature in cursive script that reads "Thomas P. Van Wazer". The signature is written in dark ink and is positioned above the typed names of the attorneys.

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DATED: October 14, 1997

ENGINEERING STATEMENT  
CONCERNING CHANNEL 31 DTV ALLOTMENT FOR KTLA-TV  
PREPARED FOR  
TRIBUNE BROADCASTING COMPANY  
KTLA-TV, LOS ANGELES, CALIFORNIA  
NTSC CHANNEL 5

This Engineering Statement was prepared on behalf of Tribune Broadcasting Company, owner of KTLA-TV, Los Angeles (NTSC Channel 5), concerning the allotment of Channel 31 for KTLA-TV's transitional DTV channel.\* Through the software implementation of the interference analysis procedure outlined in the Commission's recently released OET Bulletin No. 69 ("OET69"), this statement demonstrates that DTV Channel 31 is a viable alternative to DTV Channel 68 for KTLA-DTV.†

DTV Channel 31 at Los Angeles

An interference analysis was prepared for Channel 31 at the KTLA-TV site using the following parameters: site coordinates 34°13'36"N / 118°03'56"W; nominal effective radiated power (ERP) of 500 kW (average); and an antenna height above mean sea level of

\* KTLA-TV was allotted Channel 68 for its transitional DTV channel in the FCC's digital television ("DTV") Sixth Report and Order ("Sixth Order").

† The unsuitability of Channel 68 for KTLA-DTV has been the subject of a previous statement filed with the Commission.

1876 m.\* The following analog television broadcast stations and DTV allotments<sup>§</sup> were considered in the analysis:

Call	Location	Facilities	From Proposed KTLA-DTV	
			Bearing	Distance
KGET	Bakersfield CA	Channel 17, 5000 kW(DA), 427 m 35°26'20"N / 118°44'23"W	335.7°	148.0 km
KERO-TV	Bakersfield CA	Channel 23, 1780 kW(DA), 1128 m 35°27'14"N / 118°35'37"W	340.7°	144.5 km
KVCR-TV	San Bernardino CA	Channel 24, 1320 kW, 509 m 33°57'57"N / 117°17'05"W	111.7°	77.7 km
KCET	Los Angeles CA	Channel 28, 2450 kW(DA), 927 m 34°13'26"W / 118°03'44"W	135.2°	0.4 km
KBAK-TV	Bakersfield CA	Channel 29, 1700 kW(DA), 1137 m 35°27'11"N / 118°35'25"W	340.8°	144.3 km
KZKI	San Bernardino CA	Channel 30, 3800 kW(DA), 715 m 34°11'15"N / 117°41'58"W	97.3°	34.0 km
KPBS-DTV	San Diego CA	Channel 30, 183.5 kW(DA), 613 m 32°41'47"N / 116°56'07"W	148.0°	199.6 km
KVMD	Twentynine Palms CA	Channel 31, 12 kW(DA), 90 m 34°08'15"N / 116°11'50"W	92.2°	172.4 km
KDOC-DTV	Anaheim CA	Channel 32, 71.9 kW(DA), 728 m 34°11'14"N / 117°42'01"W	97.3°	34.0 km
KMEX-TV	Los Angeles CA	Channel 34, 1950 kW(DA), 896 m 34°13'35"N / 118°03'56"W	180.0	0.0 km
KUZZ-TV	Bakersfield CA	Channel 45, 5000 kW(DA), 404 m 35°26'20"N / 118°44'24"W	335.6°	148.0
KHSC-TV	Ontario CA	Channel 46, 2450 kW(DA), 927 m 34°13'37"N / 118°03'58"W	301.8°	0.1 km

The Longley-Rice interference analysis procedures outlined in OET69 were employed to determine the predicted interference to the above listed eligible analog television stations and DTV allotments. The interference that would be caused by the proposed Channel 31 KTLA-DTV facility to each of these facilities is summarized in the

\* This is the same transmitter site and antenna elevation as the licensed KTLA-TV facility. The effective radiated power was chosen to demonstrate the viability of Channel 31 for KTLA-DTV. A higher ERP would be necessary to fully replicate the existing KTLA-TV analog coverage on Channel 5.

§ Based on the FCC's recent DTV Sixth Report and Order.

table below with details of the area and population levels within the predicted interference areas:

<b>Interference—Caused by Proposed Channel 31 Allotment at Los Angeles</b>				
<b>Station</b>	<b>Grade B or NL Contour with Terrain Losses</b>		<b>Net Interference Area Considering Existing Interference from Other DTV and Analog stations (sq. km)(%NL)</b>	<b>Net Interference Population Considering Existing Interference from Other DTV and Analog stations (sq. km)(%NL)</b>
	<b>Area (sq.km)</b>	<b>Pop.(1990)</b>		
KGET	--	--	0.0 (0.0%)	0 (0.0%)
KERO-TV	--	--	0.0 (0.0%)	0 (0.0%)
KVCR-TV	--	--	0.0 (0.0%)	0 (0.0%)
KCET	25,792	12,568,344	1.5 (0.0%)	0 (0.0%)
KBAK-TV	--	--	0.0 (0.0%)	0 (0.0%)
KZKI	17,258	11,282,650	94.6 (0.5%)	47,228 (0.4%)
KPBS-DTV	--	--	0.0 (0.0%)	0 (0.0%)
KVMD	--	--	0.0 (0.0%)	0 (0.0%)
KDOC-DTV	20,489	11,925,371	110.6 (0.5%)	245,943 (2.1%)
KMEX-TV	21,767	12,199,913	16.0(0.1%)	1,103(0.0%)
KUZZ-TV	--	--	0.0 (0.0%)	0 (0.0%)
KHSC-TV	--	--	0.0 (0.0%)	0 (0.0%)

As indicated, the predicted interference to any given station from the DTV Channel 31 proposal will be less than 0.5% of the area and 2.1% of the population within the predicted Longley-Rice Grade B or noise-limited contour adjusted for Longley-Rice predicted terrain losses.

A study of predicted interference received to KTLA-DTV on Channel 31 was conducted considering those same stations listed above. The interference-received study was conducted using the same OET69 procedures as employed in the interference caused study. The results are summarized in the table below:

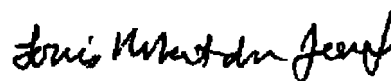


Interference to Proposed KTLA-DTV, Channel 31		
Station	Interference Area (sq. km)	Population (1990)
KZKI	145.1	165,520
KVMD	4.0	0
KDOC-DTV	8.2	7,630
Total NTSC interference (considering common interference areas)	149.1	165,520
Additional DTV interference (considering common interference areas)	0.0	0

The noise-limited contour for the proposed KTLA-DTV allotment would encompass an area of 41,260 square kilometers and a population of 13,690,225 considering areas affected by terrain losses based on the OET69 procedure. The predicted interference received by the KTLA-DTV allotment on Channel 31 is approximately 0.4% of the noise-limited terrain-limited contour area and 1.2% of the noise-limited terrain-limited contour population. On this basis, we conclude that Channel 31 is a viable alternative for KTLA-DTV.

### Conclusion

Based on the foregoing, it is concluded that Channel 31 will serve as a viable alternative for KTLA-DTV in Los Angeles.



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